

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

CASE NO. 7:08 CV 21

OPHELIA MUNN-GOINS,)
)
Plaintiff,)
)
vs.) D E P O S I T I O N
)
Board of Trustees of BLADEN)
COMMUNITY COLLEGE, DARRELL PAGE,)
in his individual and official)
capacity, and DR. KATHRYN GEISEN, in)
her individual and official capacity,)
)
Defendants.)
)

OPHELIA MUNN-GOINS - VOLUME I

TAKEN AT THE LAW OFFICES OF:
FERGUSON STEIN CHAMBERS GRESHAM & SUMTER, PA
312 West Franklin Street
Chapel Hill, NC 27516

11-05-08
02:03 O'CLOCK P.M.

Dale L. Ring
Court Reporter

Chaplin & Associates

407

27285-0407

992-1954

P. O. Box
Kernersville, NC
(336)

1

1 part, were you in the military during this entire
2 time from high school until --

3 A. From college.

4 Q. From college, okay. So when you lived
5 in Winston-Salem you were not in the military yet?

6 A. No.

7 Q. Okay. And then you retired from the
8 military immediately before going to work at
9 Bladen Community College?

10 A. While I worked -- I worked there part
11 time while I was still on active duty.

12 Q. Okay.

13 A. I was on leave.

14 Q. When did you first start?

15 A. January 2002.

16 Q. Okay. So you were hired as a part-time
17 instructor at that time?

18 A. Yes.

19 Q. And when did you retire from the
20 military?

21 A. February 1, 2002.

22 Q. And I guess if you were at Fort Sam
23 Houston, you were in the Army, right?

24 A. Yes.

25 Q. Okay. And you were a lieutenant

1 colonel?

2 A. Retired as a lieutenant colonel.

3 Q. You -- that was your rank when you
4 retired, right?

5 A. Yes.

6 Q. Are you currently employed?

7 A. No.

8 Q. In addition to your involvement as a
9 member of the school board, are you active in
10 politics at this time in any way?

11 A. Do you mean do I support other
12 candidates? Do I work with the candidates? Do
13 I ---

14 Q. Yes, do you -- I mean, not just do you
15 vote, or are you rooting for someone to win an
16 election. But do you work for candidates, or do
17 you campaign, or do you do any community activism?
18 Anything like that?

19 A. Well, I'm a community activist, yes.

20 Q. Okay. Can you describe your community
21 activist activities?

22 A. I help senior citizens get medicine. I
23 help them with housing issues. Help students try
24 to find money for college.

25 Q. All right. Do you -- well, let me ask

1 you about the work you do with senior citizens, is
2 that as part of an organization?

3 A. No.

4 Q. You just do that ---

5 A. Oh, yeah, for senior citizens? Yes, it
6 is.

7 Q. Oh, okay. What's the organization?

8 A. The Lumber River Counsel of Government
9 Aging Advisory.

10 Q. The Lumber River Counsel of Government?

11 A. Aging Advisory Committee on Board.

12 Q. Agent, a-g-e-n-t?

13 A. A-g-i-n-g, Aging.

14 Q. Oh, Aging. I'm sorry. Okay.

15 A. For housing, I help them do that.

16 Q. And do you have a position -- do you
17 have a position title with that organization?

18 A. No.

19 Q. Are you a volunteer?

20 A. Yeah.

21 Q. You don't get paid for what you do?

22 A. No.

23 Q. Okay. And all your work that you've
24 described with senior citizens is through this
25 organization?

1 A. Yes.

2 Q. The medicine and the housing?

3 A. Yes.

4 Q. Okay. And what exactly do you do in
5 trying to find senior citizens medicine and
6 housing? Do you go through governmental agencies?

7 A. I did. I don't now. Now, I'm not doing
8 that much. I was.

9 Q. Oh okay. When were you doing it?

10 A. From 2002 until maybe 2006-2000 -- early
11 2007.

12 Q. And was there a reason you stopped doing
13 it?

14 A. I haven't gotten any calls.

15 Q. Oh, so they call you and ask you. They
16 call you if they need you? Okay.

17 A. Yes.

18 Q. Yes.

19 (Off-record comments)

20 Q. And then as far as helping students find
21 money for college, is that for an organization?

22 A. Yes.

23 Q. And whose -- what's the organization?

24 A. Charles and Eva Munn Foundation.

25 Q. And is that foundation named for your

1 father?

2 A. Yes, and mother.

3 Q Oh, okay. I thought you said Charles E.
4 Munn?

5 A. Charles and Eva Munn Foundation.

6 Q. Okay. And does that -- were you a
7 founder of that foundation?

8 A. Yes.

9 Q. Did you found it with anybody else?

10 A. Community -- couple community members,
11 cousins ---

12 Q. Who ---

13 A. --- siblings.

14 Q. --- were they?

15 A. Lanna Carter, Kathleen Munn, Dr. Blanks
16 -- Delilah Blanks.

17 MS. SHEA: Off the record.

18 (Off record)

19 Q. (Ms. Shea) Okay, Lanna Carter, is she a
20 relative of yours?

21 A. Cousin.

22 Q. And Kathleen Munn?

23 A. Sister.

24 Q. And is it Ms. Blanks or Dr. Blanks?

25 A. Doctor.

1 Q. Okay. What is she?

2 A. Commission. Commission, county
3 commissioner.

4 Q. County commissioner? Okay. Anybody
5 else?

6 A. I'm sure, but I can't think of them now.

7 Q. Is there a board of directors for
8 that ---

9 A. There is.

10 Q. I'm sorry. I probably should've told
11 you this before we started, but I can tell you
12 talk a lot faster than I do, and you're probably
13 going to have to wait for me to finish my
14 question, so the court reporter can get down what
15 I'm asking you and what you're answering. Okay.
16 It'll probably drive you crazy because I talk
17 slow. I'm from the Midwest.

18 Okay. Who's on the board of directors
19 for this organization?

20 A. I am.

21 Q. Anybody else?

22 A. Kathleen Munn.

23 Q. Is her name spelled with a K or a C?

24 A. K. Wanda Daniels.

25 Q. Is Wanda Daniels a family member?

1 A. No.

2 Q. What's your relationship to her, if any?

3 A. None.

4 Q. No relationship?

5 A. No.

6 Q. How did she get on the board?

7 A. She was in the community and willing to
8 work or assist.

9 Q. Did you ask her to be ---

10 A. Yes.

11 Q. --- on the board?

12 A. I did ask her.

13 Q. Was she a volunteer before you asked
14 her ---

15 A. Yes.

16 Q. -- to join the board? So you were all
17 were doing this work before you incorporated, is
18 that ---

19 A. Yeah. When we start to incorporate, we
20 started working together. So once it was
21 incorporated and I explained to her what we were
22 doing and she started working with us, and then
23 she agreed to be a member of the board.

24 Q. Okay. So would it be fair to say she
25 joined the board a little later than some of the

1 others? You were a founding member, right, so you
2 were on the board from the beginning?

3 A. Yes.

4 Q. And would the same be true of Kathleen?

5 A. Yes.

6 Q. Did Wanda join at a later time?

7 A. The answer would have to be yes, but she
8 was on the board when the initial board was
9 established, she was a member.

10 Q. Okay. So she was on the board from the
11 very beginning?

12 A. Yes.

13 Q. Okay. So you all -- before you formally
14 created a board, you were doing work. Is that
15 right? You were doing this service work through
16 the ---

17 A. No.

18 Q. Okay. Well, how did you know Ms.
19 Daniels?

20 A. Oh, she was in my neighborhood. She's a
21 friend.

22 Q. A friend? Okay.

23 A. Yeah. She's in the neighborhood.
24 Everyone's from the neighborhood except one person
25 now.

1 A. I grew up with her in the area so.

2 Q. Do you all go to the same church?

3 A. No.

4 Q. Okay. And she is no longer on the
5 board, is that right?

6 A. That's correct.

7 Q. Do you know why she left the board?

8 A. No.

9 Q. Do you have terms for board members?

10 A. Yes.

11 Q. What's the term?

12 A. Three years unless you're appointed.

13 Q. Did she leave at the end of her
14 three-year term?

15 A. No.

16 Q. Did -- she left before the end of her
17 three-year term?

18 A. She did a second term. I mean, she --
19 somewhere in the midst she left, and I can't tell
20 you
21 when nor why.

22 Q. Okay. She had two terms but left before
23 the end of her second term?

24 A. Yes.

25 Q. Okay. And that was her decision as far

1 A. None that I can think of at the moment.

2 Q. Okay. And if you think of something
3 later on, feel free to jump in with that even if
4 we're talking about something else because I would
5 like to get everything you're involved in. But it
6 sounds like it's plenty. Now, you were working at
7 one time on your PhD, right?

8 A. Yes.

9 Q. Did you ever get that?

10 A. No.

11 Q. How far along are you on your PhD?

12 A. My dissertation.

13 Q. You've taken your comps?

14 A. Yes.

15 Q. And is that at Fayetteville State?

16 A. Yes.

17 Q. And what is the program you're in?

18 A. Educational leadership.

19 Q. Is that the same or similar to
20 educational administration?

21 A. I don't know.

22 Q. Okay. What is educational leadership?

23 A. It prepares you to be, I guess, an
24 executive or VP or president of a -- of an
25 institution whether it's a community college,

1 colonel?

2 A. Yes.

3 Q. Okay. How were you first attracted to
4 Bladen Community College as a place to work?

5 A. Dr. Page talking to him.

6 Q. So you already knew Dr. Page?

7 A. Yes.

8 Q. And how did you know Dr. Page?

9 A. My father was a member of the Board of
10 Trustees, and I met him through him.

11 Q. Did you and Dr. Page get along well?

12 A. Yes.

13 Q. Did you consider him a friend?

14 A. Yes.

15 Q. And so he recommended that you apply for
16 a teaching job?

17 A. Yes.

18 Q. Now, at that time Kay Geisen was not
19 there yet, right?

20 A. Correct.

21 Q. Okay. Did you know Lloyd Horne?

22 A. No.

23 Q. So you applied for a job?

24 A. Yes.

25 Q. And the job you applied for was

1 information technology?

2 A. Isn't it information systems, computer
3 science.

4 Q. Computer science. Okay. And would you
5 have gotten that background through your degree
6 through the University of Pittsburgh?

7 A. Yes.

8 Q. Now, did Dr. Page just tell you put in
9 an application. We'd like to consider you, or did
10 he tell you, we'll hire you. We need a teacher,
11 you've got the job?

12 A. I don't remember.

13 Q. Okay. Was it your impression that you
14 were probably going to get it, or did you know?

15 A. Didn't know.

16 Q. Did you have to go through any kind of
17 application process or anything?

18 A. I was part time at first.

19 Q. Right.

20 A. And that's what he encouraged me to do,
21 part time.

22 Q. But to start the part-time work, do you
23 remember having to go through any process other
24 than talking to Dr. Page?

25 A. Talk to Dr. Garner.

1 Q. Okay. So the only thing -- we're not
2 sure ---

3 A. It doesn't look right though. It's just
4 missing a lot in between.

5 Q. I think it does appear to be missing
6 some pages.

7 A. Okay.

8 Q. Yeah. But at least what you see does
9 look like your handwriting ---

10 A. Yes.

11 Q. --- your employment history, and your
12 education?

13 A. Yes.

14 Q. Okay. So you were hired part time and
15 taught part time for how long?

16 A. Four months -- four-and-a-half months.

17 Q. And would that be to the end of the
18 spring 2002 semester?

19 A. Yes.

20 Q. Okay. And then at some point had you
21 talked to Dr. Page or Dr. Garner or anybody about
22 going to a full-time position?

23 A. Dr. Garner called me and talked to me
24 about it.

25 Q. Okay. And did she make an offer to you?

1 A. Yes.

2 Q. And about when was that done, if you
3 remember, in 2002?

4 A. The summer 2002.

5 Q. Had you told her before that you would
6 be interested in working full time?

7 A. Yes.

8 Q. And those full-time positions I guess
9 can be either nine-month positions, ten-month
10 positions or twelve-month positions, is that
11 right?

12 A. Yes.

13 Q. And do twelve-month employees make more
14 money than nine-month employees?

15 A. No.

16 Q. They all make the same amount of money?

17 A. No.

18 Q. Well, let me take that back. The months
19 out of the year that they teach do not affect
20 their salary?

21 A. Correct.

22 Q. Okay. Is it just that the same salary
23 gets stretched out over 12 months?

24 A. No.

25 Q. What's the difference between a

1 Q. All right. But if you are a
2 twelve-month employee, and you're actually
3 working, you know ---

4 A. I don't know anything about ---

5 Q. --- August through ---

6 A. --- the other employees.

7 Q. --- July?

8 A. I have no clue.

9 Q. You have no idea. Okay. That's fine.
10 Fair enough.

11 A. Okay.

12 Q. Okay. You do know there are the three
13 types, right?

14 A. I did know that.

15 Q. Okay. And is it also your understanding
16 that faculty, full-time faculty at community
17 colleges are under a contract? They're not
18 tenured?

19 A. Yes.

20 Q. As they would be at a university, right?

21 A. Yes.

22 Q. And each year the faculty member has to
23 sign a contract ---

24 A. Yes.

25 Q. --- with the school? And it's for the

1 conversation?

2 A. Yes.

3 Q. Okay. And have we covered everybody, or
4 is there --

5 A. I'm sure there are others.

6 Q. Okay, but those were the people you had
7 identified, weren't they?

8 A. Yes.

9 Q. Okay. So your recollection is that all
10 the conversations you had at Bladen about going
11 back for your doctorate degree were positive and
12 supportive?

13 A. Yes.

14 Q. Okay. Nobody told you, well, gosh, if
15 you do this, you're not going to have time to
16 teach here. We don't like that.

17 A. No.

18 Q. Okay. Did Bladen pay for you to go
19 back?

20 A. They provided \$200, 200-some dollars for
21 tuition and books.

22 Q. Was that per semester or just ---

23 A. It might ---

24 Q. --- total?

25 A. --- have been a hundred and ninety

1 dollars. One semester I got 100-and-some dollars,
2 one semester I got 200-some dollars.

3 Q. And would you have gotten that through
4 Mr. Horne? Would ---

5 A. Yes.

6 Q. Is that how you would've applied for it?

7 A. I went through the department chair.

8 Q. Okay. So Ms. McCoy would've gone to Mr.
9 Horne ---

10 A. Should have gone ---

11 Q. --- with the request?

12 A. Yes.

13 (Off-record comments)

14 A. It would have been gone from Cynthia
15 McCoy to Kay Geisen to Lloyd Horne.

16 Q. Okay. That would -- so you didn't talk
17 directly to Mr. Horne about that?

18 A. I'm sure I did because I didn't get my
19 money. I didn't get it. Oh, you just apply. I
20 don't know. I talked to him about money for
21 school, yes.

22 Q. Did you get your money?

23 A. Yes.

24 Q. Okay. You always got it?

25 A. Yes.

1 Q. Okay.

2 A. I got something. They had a committee
3 that would approve the funds.

4 Q. Okay. Do you remember ever telling Dr.
5 Geisen that you were going back to school because
6 you wanted her job?

7 A. No.

8 Q. You never said that, or you don't
9 remember?

10 A. I want a VP job, not her job. Not at
11 Bladen. a VP job.

12 Q. Wasn't ---

13 A. I don't want ---

14 Q. --- she a ---

15 A. --- her job.

16 Q. --- VP?

17 A. Yeah, but not her job specifically, a VP
18 job.

19 Q. You told her you wanted a VP job?

20 A. A VP job.

21 Q. Okay.

22 A. So like -- if I said her job, it's like
23 VP.

24 Q. Right.

25 A. Not at Bladen.

1 faculty pay information is publicly available,
2 right?

3 A. Yes.

4 Q. Okay. And you can request that
5 information from the school, right?

6 A. Yes.

7 Q. And it's your understanding you have the
8 right to that information, correct?

9 A. Correct.

10 Q. Okay. And you requested that several
11 years, is that right?

12 A. Correct.

13 Q. Did you request it every year that you
14 taught at Bladen Community College?

15 A. Yes.

16 Q. Starting in 2002?

17 A. Yes.

18 Q. Okay. And was it given to you every
19 year?

20 A. Yes.

21 Q. And you paid a fairly small fee to the
22 school, and then they would give you the
23 information?

24 A. Yes.

25 Q. Okay. In 2002 who did you make that

1 request to?

2 A. Rosemary Crumb.

3 Q. Crumb or Crump?

4 A. C-r-u-m-b.

5 Q. Crumb. Okay, and what was her position
6 at the time if you know?

7 A. She worked in personnel. I mean, I
8 don't know.

9 Q. So she was an HR person?

10 A. Yes.

11 Q. Okay. And did you -- what you pay her a
12 dollar that year?

13 A. Yes.

14 Q. And then she gave you the information?

15 A. Yes.

16 Q. Okay. What did you do with that
17 information when you got it?

18 A. Shared it with others who wanted it.

19 Q. Okay. And who were the people you
20 shared it with?

21 A. Lee Anne Bryan and that year I think she
22 was the only one.

23 Q. Do you have any idea why Lee Anne Bryan
24 wouldn't have gotten it herself the way you did?

25 A. No.

1 Q. Okay. She didn't give you a reason for
2 that?

3 A. No.

4 Q. Did she ask to see it, or did you offer
5 it to her?

6 A. I don't remember.

7 Q. Okay. And then in 2002 you did it
8 again?

9 MR. GRESHAM: 2002 or ---

10 MS. SHEA: Or I'm sorry. Thank
11 you.

12 Q. (Ms. Shea) 2003?

13 A. Yes.

14 Q. You made the same request in -- was it
15 to Ms. Crumb again?

16 A. Yes.

17 Q. And was she still in the same position
18 as far as you know at that time?

19 A. Yes.

20 Q. Okay. And she gave it to you?

21 A. Yes.

22 Q. You paid a dollar?

23 A. I don't know how much I paid. I paid.

24 Q. That's the ballpark anyway?

25 A. Yes.

1 Q. A dollar is in the ballpark? Okay. And
2 did you share it with other employees in 2003?

3 A. Yes.

4 Q. And do you remember who ---

5 A. No.

6 Q. Okay.

7 A. I know I shared it, but I don't know
8 with whom.

9 Q. Okay. And if you don't remember who you
10 shared it with, I assume you also don't remember
11 why they didn't just go get it themselves?

12 A. Correct.

13 Q. Okay. 2004, you asked for it?

14 A. I think I did.

15 Q. Okay. And I think, if I can find it
16 here, I have a copy of a request that I think
17 might have been your request in 2004. Let me see
18 if I can find that.

19 (Ms. Shea examined document)

20 (DEPOSITION EXHIBIT

21 NUMBER FOUR WAS MARKED

22 FOR IDENTIFICATION)

23 Q. Okay. I'm going to hand you what's been
24 marked as Exhibit Four. Do you recognize that
25 document?

1 A. Yes.

2 Q. Is that your handwriting?

3 A. Yes.

4 Q. And is that a 2004 request for salary
5 information?

6 A. Yes.

7 Q. Okay. And I believe that was to
8 somebody else, wasn't it?

9 A. It was Rosemary Crumb.

10 Q. Okay.

11 A. Pitkins is her last name.

12 Q. Okay. And again, you reference a one
13 dollar fee ---

14 A. Yeah.

15 Q. --- for the information? Okay.

16 And in 2004 was Ms. Crumb still in human
17 resources ---

18 A. I think so.

19 Q. --- in the same job she'd been in?

20 A. I think she was.

21 Q. Okay. And did you share that
22 information with somebody else in 2004?

23 A. I'm sure I did.

24 Q. Do you remember who?

25 A. No.

1 Q. Okay. And I should -- in 2002, 2003,
2 2004, you shared it with other -- at least one
3 other individual, maybe multiple individuals?

4 A. Not in 2002 because I didn't really no
5 anyone. That's why I don't think I only shared it
6 with the one person ---

7 A. Okay.

8 Q. --- in 2002.

9 Q. In 2003 and 2004, you did share it with
10 other people?

11 A. Yes.

12 Q. Plural?

13 A. I -- I'm sure I did.

14 Q. Okay. And there was no uproar about
15 that, is that right?

16 A. No.

17 Q. Did you get in trouble for asking for
18 it?

19 A. No.

20 Q. Okay. Then in 2005, did you ask for it
21 again?

22 A. I'm probably sure I did.

23 Q. Okay. And would that have been from Ms.
24 Crumb?

25 A. I can't tell you. I don't know who was

1 there then.

2 Q. Did she leave at some point around 2005
3 or 2006?

4 A. Yes.

5 Q. Okay. And at some point did those
6 requests get referred to Mr. Horn?

7 A. Yes.

8 Q. Okay. And that might have been 2005, or
9 it might have been 2006? You just don't remember?

10 A. Yes.

11 Q. Okay. But in any event in 2005, you did
12 ask for the information from somebody; you got it;
13 you might have shared it with some people. No big
14 deal, right?

15 A. Yes.

16 Q. Okay. And then in 2006 Ms. Crumb was
17 gone, right?

18 A. I don't know.

19 Q. You don't know?

20 A. I don't know when she left.

21 Q. Okay.

22 A. It's probably six because I think that
23 -- yes. Because I sent it to the other person.

24 Q. Tiina Mundy?

25 A. Yes.

1 MS. SHEA: Presumably. Presumably.

2 Yes.

3 MR. GRESHAM: Okay.

4 Q. (Ms. Shea) Okay. When you asked for
5 the information from Ms. Mundy whenever you asked
6 for it, do you recall that it was handled
7 differently from past occasions?

8 A. Yes.

9 Q. Okay, what was different?

10 A. She sent an email telling me that I had
11 to -- that Lloyd Horne, she forwarded an email
12 from Lloyd Horne saying I had to talk to Dr. Page
13 to get -- before it could be released.

14 Q. Okay. Did you ask her or anybody else
15 why you had to go through Dr. Page?

16 A. Yes.

17 Q. And what were you told?

18 A. That I had to ask Dr. Page.

19 Q. That was ---

20 A. That Lloyd Horne said I had to ask Dr.
21 Page.

22 Q. Okay, so you asked, why do I have to do
23 it? And they said because Lloyd ---

24 A. Lloyd Horne ---

25 Q. --- said so.

1 A. --- said to.

2 Q. Okay. And that was different from in
3 the past?

4 A. Yes.

5 Q. Okay. And then did you make the request
6 through Mr. Horne -- or through Dr. Page I guess?

7 A. Yes.

8 Q. Okay. Do you remember approximately
9 when you asked Dr. Page for that information?

10 A. Sometime that year, no.

11 Q. Okay. You don't have an idea of how
12 much time elapsed between your first request to
13 Ms. Mundy and then when you went to Dr. Page?

14 A. No.

15 Q. Okay. What happened when you went to
16 see Dr. Page about it?

17 A. He asked me why, why I wanted it.

18 Q. Okay. And what did you tell him?

19 A. For personal reasons.

20 Q. Okay. And what did you mean by that?

21 A. For my personal use to do whatever I
22 choose to do with it. It's personal.

23 Q. Okay.

24 A. And I explained to him that other people
25 were applying for jobs, and that way I could at

1 least give them a ballpark figure of what the
2 position would pay.

3 Q. You told Dr. Page that?

4 A. Yes.

5 Q. And what was his response?

6 A. He just said okay. That's all I
7 remember.

8 Q. He said okay?

9 A. (Witness moved head up and down)

10 Q. And then did you get the information?

11 A. A long time later. I had to keep asking
12 Lloyd Horne for it.

13 Q. Okay, you had to ask Lloyd Horne for it?

14 A. And eventually he gave me one sheet,
15 then a couple days later I found an envelope in my
16 box with another sheet. But I never received it
17 all, no.

18 Q. Okay. Did you ever have a discuss --
19 did you have any other discussions with Dr. Page
20 about the information except for the one you've
21 already testified about?

22 A. Yes. When I got a reprimand for it.

23 Q. Okay. But not until then?

24 A. Right.

25 Q. Okay. So let's hold off on talking

1 about the reprimand for now.

2 Then you asked Dr. -- or you asked Mr.
3 Horne about it?

4 A. Yes.

5 Q. Okay. And do you remember every
6 conversation you had with Mr. Horne about it?

7 A. No, I don't remember every. But I
8 remember one or two.

9 Q. Okay.

10 A. When I went to his office and asked him
11 for it and he said, well, what do you need it for?
12 And I said it's for personal use, and I was going
13 to share it with Felicia Williams. He said, well,
14 why don't you charge her for it? And I said, no,
15 I'm
16 not going to charge her for it. I was going to
17 give her a copy. That was it.

18 Q. Okay. So you told him that you were
19 going to share the information with Felicia
20 Williams?

21 A. Yes.

22 Q. Okay. And that you were just going to
23 give her a copy of what you had?

24 A. Yes.

25 Q. Okay. And what was his response to

1 secretaries?

2 A. None of theirs.

3 Q. Or them?

4 A. That's correct.

5 Q. Not Mr. Horne's salary or Dr. Page's
6 salary or Dr. Geisen's salary?

7 A. Correct.

8 Q. So upper administration was not included
9 on this list at all?

10 A. No staff, no executive management.

11 Q. Okay.

12 A. And no staff.

13 Q. And no -- and con ed, you would include
14 in staff?

15 A. Well, con ed is a separate department
16 basically, but then on the curriculum, on -- no
17 administrative staff were included at all. The
18 secretary, the janitor, none of them were included
19 -- were included.

20 Q. Okay. And what were you planning to do
21 with that information besides share it with Ms.
22 Williams?

23 A. Well, I always share it with Lee Anne
24 Bryan. I use it -- Barbara Morrison was retiring.
25 There was a guy looking for a job. So what I

1 would normally do when people look for a job is
2 look at the salary range. I would not tell them
3 exactly what the person makes, but I'll say you
4 could probably get about whatever.

5 Q. Uh-huh (yes).

6 A. There was someone looking for a job, and
7 I was going to tell him.

8 Q. Who is the person looking for the job?

9 A. I think it was Ronald Lloyd at that
10 time.

11 Q. Ron Lloyd?

12 A. Ronald Lloyd.

13 Q. Ronald Lloyd. And was he a friend of
14 yours?

15 A. Yes.

16 Q. Okay. How did you know Mr. Lloyd?

17 A. High school.

18 Q. And the lady who was leaving, what was
19 her name?

20 A. Barbara Morrison.

21 Q. And what was her position?

22 A. Political science instructor, history.

23 Q. Okay, so Mr. Lloyd was interested in Ms.
24 Morrison's job?

25 A. He was interested in a job.

1 Q. Any job?

2 A. Yes.

3 Q. Or any job within reason?

4 A. Yes.

5 Q. Okay. And so you were going to share
6 this information with him so that he could decide
7 whether this was a job he could support himself
8 with and, you know, make a decent living at?

9 A. No. What I do is look at the scale and
10 then I was going to tell him about -- because,
11 see, she had years. He couldn't get the same
12 amount because he didn't have 30 years, 25 years,
13 so there's no way. But you can look at the scale
14 and see where someone has been there maybe two or
15 three years, like me and what he could qualify
16 for.

17 Q. Okay. But you knew what you made,
18 right?

19 A. Yes.

20 Q. So you needed the other people's
21 information, why?

22 A. I didn't say I needed it. I asked.

23 Q. Well, you wanted it, why?

24 A. For personal reasons.

25 Q. But you were going to use it to share

1 with Mr. Lloyd?

2 A. No, not like that. No.

3 Q. You were going ---

4 A. I would never show that.

5 Q
6 . --- to share the range ---

7 A. I would never show him the schedule.

8 Q. Okay. You were not going to show him
9 names and salaries, but you were going to show him
10 -- you were going to use that information to tell
11 him, you know, you could expect probably somewhere
12 in

13 the ballpark of X-thousand dollars a year --

14 A. Yes.

15 Q. -- teaching at Bladen County with your
16 experience and your background?

17 A. Definitely.

18 Q. Okay. So the sheet Mr. Horne gave you,
19 wouldn't that have accomplished that purpose?

20 A. Yes.

21 Q. Because it was just faculty, and that's
22 what you were thinking Mr. Lloyd would want,
23 right?

24 A. Possibly, yes.

25 Q. Okay. But you were thinking he might
also want another type of position?

1 A. No.

2 Q. As far as the staff in the upper
3 administration positions, why did you want that?

4 A. Personal information, just personal to
5 know.

6 Q. Just so you'd know?

7 A. Yeah.

8 Q. Okay.

9 A. It was public. That's why I wanted it
10 because it was public.

11 Q. Okay. So you had the second
12 conversation with Mr. Horne, he gave you the one
13 sheet. Did you notice right then that it didn't
14 have everybody on it?

15 A. Yes.

16 Q. And did you tell him this isn't
17 complete?

18 A. I don't remember if I did or not.

19 Q. Okay. Did you have any further
20 discussion at that time with Mr. Horne?

21 A. I don't remember.

22 Q. Okay. May have, may not have?

23 A. Yeah.

24 (Off-record comments)

25 A. Yes.

1 Q. And did you ever get any other sheets
2 than those two?

3 A. No.

4 Q. And when you got the second sheet, did
5 you get that sheet together with the first sheet
6 you had already received from Mr. Horne, the one
7 with the faculty information on it? Did you get
8 those two pages together?

9 A. No.

10 Q. You never put them together?

11 A. I didn't get them together, no.

12 Q. I know you didn't -- excuse me. Did you
13 put them together?

14 A. You mean staple them together?

15 Q. Or just have them side by --

16 A. Oh, I'm sure I did.

17 Q. Okay.

18 A. I'm sure.

19 Q. And then did you share those pages with
20 certain people?

21 A. Yes.

22 Q. Okay. And who were the people you
23 shared them with?

24 A. Felicia Williams, Lee Anne Bryan,
25 Kenneth Oxendine.

1 Q. And nobody else?

2 A. At the same time, Felicia Williams gave
3 a copy to Ella Joe Sellers.

4 Q. Okay.

5 (Off-record comments)

6 Q. Now, Felicia Williams, what is her
7 position?

8 A. Instructor at the time.

9 Q. Okay, what does she teach?

10 A. English. I think she's the chair. I
11 don't know.

12 Q. And I can't remember if you told me
13 this, what is Ms. Bryan's position?

14 A. Accounting.

15 Q. In what?

16 A. Computer science.

17 (Off-record comments)

18 Q. And Mr. Oxendine?

19 A. He's one of the technical. I don't know
20 which one. He's technical.

21 Q. Is he a faculty member?

22 A. Yes.

23 Q. Okay. And how about Ms. Sellers?

24 A. She's English faculty.

25 Q. Okay. Can you tell me about -- when you

1 shared this information with Ms. Williams, Ms.
2 Bryan, and Mr. Oxendine, were all four of you
3 together?

4 A. Yes.

5 Q. Where were you?

6 A. In my office.

7 Q. Okay. Was this after hours?

8 A. No -- well, yes, it was. It was after
9 hours.

10 Q. Okay.

11 A. My work hours were over, yes.

12 Q. Approximately, what time of day was it?

13 A. 3:15-3:30, I think.

14 Q. Okay. And did you call them in?

15 A. I called Felicia.

16 Q. Okay. How did Ms. Bryan and Mr.
17 Oxendine join you? How did they find out?

18 A. Ms. Bryan had already had a copy -- had
19 already given her a copy earlier.

20 Q. Okay. And how about Mr. Oxendine?

21 A. He said he overheard us talking in the
22 office, and he came back and asked for a copy.

23 Q. Okay.

24 A. His office is next door.

25 Q. So he heard you all talking, he said?

1 A. I think it was.

2 Q. Did you give out copies to anybody else
3 at any time?

4 A. Not that I can remember.

5 Q. Okay, you might have?

6 A. Could have.

7 Q. Okay.

8 A. But I doubt it.

9 Q. Whenever you did give out copies, would
10 you have handed them directly to the person?

11 A. Yes.

12 Q. You didn't put them in people's
13 mailboxes or ---

14 A. No.

15 Q. --- on their desks, is that right?

16 A. Yes.

17 Q. Okay. So if you gave it to more people
18 than just these people we've identified, you
19 would've handed it directly to them?

20 A. I know I gave a copy to Felicia
21 Williams, Lee Anne Bryan, Kenneth Oxendine. No
22 other person I gave a copy to.

23 Q. Oh, okay. You're sure of that?

24 A. Yes.

25 Q. Okay.